

ANDERSON KILL P.C.
Edward J. Stein (ES8836)
1251 Avenue of the Americas
New York, New York 10020
(212) 278-1000

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SEA TRADE MARITIME CORPORATION
and GEORGE PETERS,

Plaintiffs,

- against -

STELIOS COUTSODONTIS,

Defendant.

Civil Action No. 09 Civ. 488 (LGS) (HBP)

**AFFIDAVIT OF HOWARD BENJAMIN
IN SUPPORT OF PETITION TO
ENFORCE ATTORNEY'S LIEN AND
JUDGMENT**

STATE OF NEW YORK)
 : ss.:
COUNTY OF NEW YORK)

HOWARD BENJAMIN, having been duly sworn deposes and says:

1. I am a member of the Bar of the State of New York and the attorney of record for Plaintiffs Sea Trade Maritime Corporation ("Sea Trade") and George Peters in this action. I submit this Affidavit in support of the Petition of Anderson Kill P.C. ("AK") to Enforce Attorney's Lien and Judgment herein (the "Petition").

2. Sea Trade and Peters consent to and fully support AK's Petition.

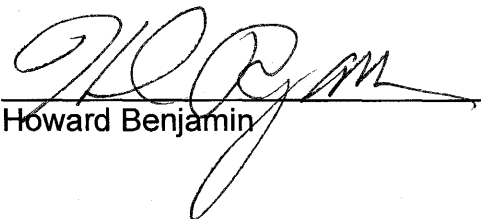
3. Attached hereto as Exhibit A is a true and correct copy of my Affirmation In Support Of Order To Show Cause dated August 26, 2013, which I submitted on behalf of Peters and Sea Trade in *Coutsodontis v. Sea Trade Maritime*

Corp. et al., Index No. 653946/2012, N.Y. Supreme Court, N.Y. County (the "August 2013 Affirmation").

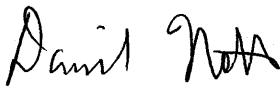
4. Attached in turn to the August 2013 Affirmation (and therefore included within Exhibit A hereto) are true and correct copies of exhibits to the Benjamin Affirmation itself, including (a) the April 18, 2013 Decision and Order of the Court in *Coutsodontis v. Sea Trade Maritime Corp. et al.*, Index No. 653946/2012, N.Y. Supreme Court, N.Y. County; (b) a letter dated April 9, 2013, from Scott R. Johnston, Esq., to Hon. Eileen A. Rakower; and (c) the Affidavit of Konstantinos Spaidiotis dated May 28, 2013 (the "Spaidiotis Affidavit").

5. Attached in turn to the Spaidiotis Affidavit as Attachment A thereto (and therefore included within Exhibit A hereto) is a true and correct copy of the sworn translation dated May 28, 2013 by Konstantinos Spaidiotis of the Report of Rapporteur Judge of Supreme Court of Greece Efgenias Progaki, together with that report in the original Greek. See Spaidiotis Affidavit ¶ 12.

6. Attached hereto as Exhibit B is a true and correct copy of a Power of Attorney dated August 18, 1992, executed by the President of Sea Trade Maritime Corporation at that time, Athena E. Eliades, appointing George Peters as the corporation's Attorney in Fact.


Howard Benjamin

Sworn to before me this
13th day of January 2014



Notary Public

DANIEL B. NOTTES
Notary Public, State of New York
No. 02NQ6219958
Qualified in New York County
Commission Expires 04/05/2014